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Attorneys for Defendant Qwest Corporation

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

NICKOLAS FACAROS,

Case No. 10-6343-HO

Plaintiff,

v.

**DEFENDANT'S MOTION FOR
PROTECTIVE ORDER STAYING ALL
DISCOVERY**

QWEST CORPORATION, a Colorado
Corporation,

Defendant.

Pursuant to Local Rule 7.1(a), defendant, Qwest Corporation ("Qwest"), certifies that the parties made a good faith effort through telephone conferences to resolve the dispute but have been unable to do so.

Pursuant to Federal Rules of Civil Procedure 26(c), Qwest moves this Court for a protective order staying all discovery, including response to plaintiff's pending discovery

requests, in this matter pending resolution of Qwest's Motion to Dismiss, filed concurrently herewith.

This Motion is supported by the pleadings and the concurrently filed supporting Memorandum of Law and Declaration of Sarah J. Crooks.

DATED: March 7, 2011

Respectfully submitted,

PERKINS COIE LLP

By: *s/ Sarah J. Crooks*

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